

FILED 24 JAN '12 16:30 USDC-ORP

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

Case No. 11-cr-00385-HZ

v.

SUPERSEDING INDICTMENT

RASHAD Q. SANDERS,

18 U.S.C. § 2423

18 U.S.C. §§ 1591, 1594(a)

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

Transportation of a Minor

18 U.S.C. § 2423(a)

In September 2008, in the District of Oregon and elsewhere, **RASHAD Q. SANDERS**, defendant herein, did knowingly transport "C.K.", a female under the age of 18, in interstate commerce from the State of Minnesota to the State of Oregon, with the intent that "C.K." engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2423(a).

COUNT 2

Transportation of a Minor

18 U.S.C. § 2423(a)

In September 2008, in the District of Oregon and elsewhere, **RASHAD Q. SANDERS**, defendant herein, did knowingly transport "D.M.", a female under the age of 18, in interstate commerce from the State of Minnesota to the State of Oregon, with the intent that "D.M." engage

in prostitution, or in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2423(a).

COUNT 3
Sex Trafficking of a Minor
18 U.S.C. §§ 1591(a) and (b)(2)

In September 2008, in the District of Oregon and elsewhere, **RASHAD Q. SANDERS**, defendant herein, knowingly did the following acts while knowing a female "D.M." had not attained the age of 18 years and would be caused to engage in a commercial sex act:

- (a) Defendant, **RASHAD Q. SANDERS**, did, while in or affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, by any means, a person known as "D.M."; and
- (b) Defendant, **RASHAD Q. SANDERS**, did benefit, financially or by receiving anything of value, from participation in a venture which engaged in the recruiting, enticing, harboring, transporting, providing, or obtaining a person known as "D.M.".

All in violation of Title 18, United States Code, Sections 1591(a) and (b)(2), 1594(a).

COUNT 4
Sex Trafficking of a Minor
18 U.S.C. §§ 1591, 1594

Beginning about June 2010, and continuing through about May of 2011, in the District of Oregon and elsewhere, **RASHAD Q. SANDERS**, defendant herein, knowingly did the following acts while knowing and in reckless disregard of the fact that a female, "C.C.", had not attained the age of 18 years and would be caused to engage in a commercial sex act:

- (a) Defendant, **RASHAD Q. SANDERS**, did, while in or affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, or maintain by any means and attempt to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, a person known as "C.C."; and
- (b) Defendant, **RASHAD Q. SANDERS**, did benefit, financially or by receiving anything of value, from participation in a venture which engaged in or attempted to engage in the recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means a person known as "C.C."

All in violation of Title 18, United States Code, Sections 1591(a), (b)(2), and 1594(a).

DATED this 24 day of January 2012.

A TRUE BILL

OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL
United States Attorney



KEMP L. STRICKLAND, OSB #96118
Assistant United States Attorney